



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107-4431

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(pg. 1)

Hazardous Waste Management Division  
Office of Superfund  
Pennsylvania Remedial Branch  
Western Pennsylvania Section

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SDMS DocID 2232380

Mr. Eugene A. Miller  
Environmental Services Manager  
Environmental Services Department  
Lord Corporation  
4917 Pittsburgh Avenue  
Erie, PA 16509

July 20, 1994

RE: Lord Shope Landfill Superfund Site  
APPROVAL Remedial Design (RD)

Dear Mr. Miller:

The U.S. Environmental Protection Agency (EPA) approves the document: FINAL Remedial Design (RD), Lord Shope Landfill Superfund Site submitted by Lord Corporation.

The RD approval is based on: Eckenfelder Inc.'s, June 23, 1994 comment response letter, which adequately addressed comments raised by EPA in its June 10, 1994 letter, PA DER's concurrence of the RD approval, and BTAG's satisfaction with wetlands related issues.

The enclosure contains a copy of the PA DER letter on the approval of the Erosion & Sedimentation Control Plan and comments generated by the BTAG. The primary concerns of the BTAG comments involve wetlands impact issues during the implementation of the remediation at the Site, and the delineation of Area C. The issues raised in the wetlands impact comments may be best addressed during the implementation of the RA. The issue involving the delineation of forested Area C of having a moderate habitat value is professional judgement of BTAG.

EPA looks forward to the start of the Remedial Action (RA) at the Site. If you have any questions, or if I may be of assistance, please contact me.

Sincerely,



David P. Turner, RPM  
Environmental Engineer

2 Encls.

cc: J. Pike, EPA (3HW23)  
[REDACTED] E & E  
[REDACTED] Eckenfelder

R. Kimball, PADER  
[REDACTED] Eckenfelder  
R. Burr, FWS

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The Biological Technical Assistance Group (BTAG) has reviewed the April 1994 Remedial Design Submission for Lord Shope Landfill in Girard Township, Erie County, Pennsylvania.

These comments are offered for use, on behalf of FWS and EPA BTAG members.

BTAG offers specific comments on Volume IV, Attachment C, "Revised Wetlands Assessment Report"; and on Volume VII, Attachments I, J, and K (i.e., "Wetlands Impact Reduction Plan, Field Sampling Plan, and Long Term Monitoring Plan," respectively).

# **1. VOL. IV, ATTACHMENT C, REVISED WETLANDS ASSESSMENT REPORT**

In general, BTAG finds the April 1994 revised report has overall addressed BTAG's February 28, 1994 comments on the November 1993 report relative to wetland delineation and the impact of ground water extraction on area wetlands.

However, BTAG continues to have concerns with the report's assessment of area wetland functional values, especially for wetland Area C. We note the wetland valuation procedure fails to provide a complete landscape description of the wetlands (i.e., integrating description of vegetative community species composition by noting abundance, diversity, and density of vegetative species), and estimate site habitat value based on comparison to area's total habitat value. Though the last sentence on pg. 5-6 notes the site wetland values presented in Table 5-5 are interpreted in terms of the watershed off-site wetland system, no values are provided for area wetlands (e.g., by county or watershed) similar in landscape feature to site wetlands.

The value of wetlands, especially the general habitat value for fish and wildlife species, must consider the interspersions of all area habitat types. The report emphasized that best professional judgement was used in the wetland evaluation process. We can only infer such judgement evaluated the site wetlands by considering the type, amount, and interspersions of all area habitat both upland and wetland.

The BTAG, based on only a one-day site visit and also using best professional judgement, generally agrees with the valuation given for each wetland in Table 5-5. However, we still consider the forested wetland Area C to have "moderate" and not "low" general habitat value. We note the forested wetland Area F is estimated to have moderate habitat value, but since Area C is in the same forest complex as Area F, and C is over four times

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larger than F, we find no reason why the general habitat value of Area C is different from that of Area F.

We note the newly added material in Section 5.2.2., "Wetland Value," on potential food value of the wetland areas is interesting but not of sufficient detail and scope for making relative value judgements. The second paragraph on pg. 5-9 gives an inferred low food value to the assessed wetlands. We believe the value judgement is inappropriate especially as it does not note the limitations described in the referenced text, "American Wildlife and Plants: A Guide to Wildlife Food Habitat." The referenced text states, "An approximate tentative picture of the food habits of an animal or the extent of food use of a plant is all that should be attempted or implied." Therefore, BTAG recommends this second paragraph more fully note the uncertainty associated with food value contribution estimates.

As the report concludes there is uncertainty whether Areas A, B, C, and F will be affected by selected site remedial actions, we strongly support the inclusion in the site's long-term monitoring plan of a proposal, as on pg. 5-5 last paragraph in Section 5.1.4, "Baseline Hydrologic Conditions," to evaluate the actual drawdown of ground water levels from operation of the proposed ground water extraction and treatment system. This drawdown monitoring should also include physical wetland measurements, such as changes in vegetative species composition (i.e., density, diversity, and abundance) and stress or death of wetland vegetative species.

The proposal for the long-term monitoring plan should undergo BTAG review.

## 2. VOL. VII, ATTACHMENT I, WETLANDS IMPACT REDUCTION PLAN

The April 1994 attachment has adequately addressed BTAG comments on Section 2.0, "Wetland Assessment."

We still recommend Section 4.0, "Wetlands Impact Reduction Measures," incorporate BTAG's recommendation to conduct a quantitative wetland drawdown monitoring plan that measures field parameters such as density, diversity, and abundance for both wetland and upland vegetation. The 1989 Manual for wetland delineation provides guidance for developing and conducting a quantitative vegetative community assessment.

Lastly, BTAG again notes Lord Corporation is still responsible for preparing a plan to mitigate all unavoidable wetland impacts in order to comply with EPA's 1989 goal of "no net loss" of wetlands and to meet the legislative intent of the

Clean Water Act to restore and maintain the chemical, physical, and biological integrity of the Nation's waters which includes wetlands. BTAG also finds that CERCLA as amended by SARA directs that mitigative measures be implemented for environmental impacts of remedial actions.



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES  
RR 2, Box 614, Mosiertown Road  
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July 5, 1994

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Northwest Regional Office

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US EPA  
WESTERN PA SECTION  
3HW23

Mr. Dave Turner  
Remedial Project Manager (3HW23)  
U.S. Environmental Protection Agency  
841 Chestnut Building  
Philadelphia, PA 19107

RE: Final Remedial Design  
Erosion & Sedimentation Control Plan  
Lord-Shope Landfill Site

Dear Mr. Turner:

Staff persons from the Pennsylvania Department of Environmental Resources Hazardous Sites Cleanup Program and Erie County Soil Conservation Service (SCS) have reviewed the Erosion and Sedimentation Control (E&SC) Plan dated April 1994 for the Lord-Shope Landfill Site located in Girard Township, Pennsylvania. The Department is satisfied with the aforementioned submittal and approves the E&SC plan as final.

If you have any questions regarding this approval, please feel free to contact me at the number above. Thank you for your consideration in this matter.

Sincerely,

Robert J. Kimball  
Project Manager  
Hazardous Sites Cleanup

cc: Mr. Kimball (file)  
Ms. Dougherty  
Mr. Olewiler



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES  
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June 21, 1994

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JUN 27 1994

US EPA  
VIA AIR MAIL SECTION

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Northwest Regional Office

Mr. Dave Turner  
Remedial Project Manager (3HW23)  
U.S. Environmental Protection Agency  
841 Chestnut Building  
Philadelphia, PA 19107

RE: Final Remedial Design  
Lord-Shope Landfill Site

Dear Mr. Turner:

Staff persons from the Pennsylvania Department of Environmental Resources Hazardous Sites Cleanup Program have reviewed the Revised Remedial Design Report dated April 1994 for the Lord-Shope Landfill Site located in Girard Township, Pennsylvania. The Department's comments on the 90% Prefinal Design Submittal dated November 1993, (Department's January 7, 1994 comment letter), have been adequately addressed by Lord's environmental consultant, ECKENFELDER, INC.. The Department accepts the Remedial Design Submissions (Vols. I - VIII), as final except for Vol. VII. The Department has forwarded Volume VII, Erosion and Sedimentation Control (E&SC) Plan, to the Soil Conservation Service for their review and is awaiting completion of this review. The Department will forward all E&SC comments to you as soon as possible.

If you have any questions regarding the above comments, please feel free to contact me at the number above.

Sincerely,

Robert J. Kimball  
Project Manager  
Hazardous Sites Cleanup

cc: Mr. Kimball (files)  
Ms. Dougherty  
Mr. Olewiler

